



UNITED STATES | ENGLAND | GERMANY | CHINA

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June 5, 2007

VIA OVERNIGHT MAIL

Mr. Richard T. Garren
 Riggs, Abney, Neal, et al.
 502 West Sixth Street
 Tulsa, OK 74119-1010

Re: State of Oklahoma v. Tyson, et al.
Case No. 05-CV-0329 GKF-SAJ

Dear Mr. Garren:

As referenced in my May 4, 2007 letter, please find enclosed one CD containing updated text load files with additional "Source" information for the Cargill Defendants' 1st through 4th productions. "Source" information has already been produced for the Cargill Defendants' 5th and 6th productions. Additionally, you will find on the CD TIFF images of additional file folder labels for Cargill's previously produced grower files. We further include an Excel document with a worksheet entitled "Grower Files – Folder Name Info" to assist you in understanding the documents associated with each referenced file folder.

Also enclosed on the Excel document are six worksheets entitled "PROD 01" through "PROD 06." These worksheets provide all currently available "Folder Name" information for the documents provided in each of the Cargill Defendants six document productions. You will note that for a small portion of the documents, most of which were collected from individual employee offices, we are unable to provide "Folder Name" information at this time. This is because the documents either were not maintained by these employees in labeled folders, or because of an error on the part of the document processing vendors in failing to properly capture the folder information for those documents. Still, the detailed "Source" information provides, where appropriate, the specific name of the individual from whose office a document was collected.

In particular worksheet "PROD 01" corrects an inadvertent error in the index sent with the cover letter to our first production dated December 5, 2006. Our cover letter incorrectly stated that CARTP000005-CARTP007981 was all "Grower Files," but as reflected in "PROD 01" the correct breakdown is actually as follows:

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DEPOSITION
 EXHIBIT

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EXHIBIT

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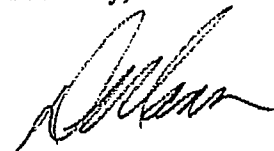
Bates Range	Description
CARTP000005-CARTP000447	Best Management Practices
CARTP000448-CARTP000706	Document Retention Policies
CARTP000707-CARTP000772	Flock Schedules
CARTP000773-CARTP0007981	Grower Files

Finally, worksheets "PROD 01" through "PROD 06" identify which of Plaintiffs' document requests the Cargill Defendants believe each document to correspond based upon a preliminary review. Please note that we are providing this information to you as a matter of professional courtesy based upon the State's representations during the April 27, 2007 hearing that it is unable to assess the method of the Cargill Defendants' production. In undertaking to provide this information, the Cargill Defendants are going far beyond what is ordinarily required by Rule 34 with regard its six previous productions. However, the Cargill Defendants reserve the right to make any future productions in either of the manners contemplated by the rule in their sole discretion.

Together, the information provided in the load files and the above-referenced spreadsheets will further enable the State to comprehend where and how the documents were maintained at the Cargill facilities down to folder level detail, where available. Additionally, the information will assist the State in understanding how the documents correspond to their document requests.

We trust that the State will find that this information satisfies their concerns as to the method of the Cargill Defendants' document productions. However, if it does not, I reiterate the request made in my May 4, 2007 letter that the State provide a detailed explanation of the alleged deficiencies in the Cargill Defendants' production.

Sincerely,



Dara D. Mann

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cc: Theresa Hill

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